

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK (WHITE PLAINS)

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In re:

Chapter 13

JOHN J INZEO,
DANA L INZEO,

Case No.: 20-22920-SHL

Debtors.

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**OBJECTION OF CREDITOR, KEYBANK, N.A.,
TO DEBTORS' CHAPTER 13 CONFIRMATION**

Now comes Creditor, KEYBANK, N.A. (hereinafter referred to as "Objecting Creditor"), claimant and party in interest in the above Chapter 13 proceeding, and hereby OBJECTS to the Debtors' proposed Chapter 13 Plan (hereinafter referred to as "Plan"). For the factual, legal and statutory bases set forth in the attached Memorandum, confirmation of the Debtors' Plan should be DENIED.

Respectfully submitted,

/s/ Geoffrey J. Peters

GEOFFREY J. PETERS

Weltman, Weinberg & Reis Co., L.P.A.

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Counsel for Creditor

KEYBANK, N.A.

MEMORANDUM

The Debtors, JOHN J INZEO AND DANA L INZEO executed a Key Equity Options Agreement for the 7 Virginia Street, New City, NY 10956 on May 10, 2017. The Debtors filed a Chapter 13 bankruptcy on August 6, 2020. The amount due and owing on Objecting Creditor's claim is \$87,326.23.

The Objecting Creditor states that the proposed plan fails to properly list and provide for Objecting Creditor's claim. As such, Objecting Creditor is denied adequate protection under the plan.

WHEREFORE, confirmation should be denied under 11 U.S.C. § 1325(a)(1).

Respectfully submitted,

/s/ Geoffrey J. Peters

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Counsel for Creditor
KEYBANK, N.A.

STATE OF OHIO)
COUNTY OF FRANKLIN) ss.:

Bobbi Jo Cooney, being duly sworn, deposes and says: deponent is not a party to the action, is over 18 years of age and resides at Columbus, Ohio.

On September 23, 2020 deponent served the within

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

upon the following parties, at the addresses designated by said parties for that purpose, by depositing a true copy of same, enclosed in a post-paid properly addressed wrapper in an official depository under the exclusive care and custody of the United States Postal Service within the State of Ohio:

UNITED STATES TRUSTEE
U.S. FEDERAL OFFICE BUILDING
201 VARICK STREET, ROOM 1006
NEW YORK, NY 10014

JOHN J INZEO (Debtor)
7 VIRGINIA STREET
NEW CITY, NY 10956

DANA L INZEO (Debtor)
7 VIRGINIA STREET
NEW CITY, NY 10956

MICHAEL A. KOPLIN, ESQ.
14 SOUTH MAIN STREET, STE. 4
NEW CITY, NY 10956-3546

TRUSTEE
KRISTA M. PREUSS
399 KNOLLWOOD ROAD
WHITE PLAINS, NY 10603-1931

/s/ Bobbi Jo Cooney
BOBBI JO COONEY